



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5.  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

**JUN 23 1985**

(AE-17J)

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Marcus Leavitt, General Manager  
Rea Magnet Wire Company, Inc.  
3600 East Pontiac Street  
Fort Wayne, Indiana 46803

**Re: Finding of Violation**  
Rea Magnet Wire Company, Inc.  
Fort Wayne, Indiana

Dear Mr. Leavitt:

The United States Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Rea Magnet Wire Company, Inc. (Rea Magnet) under Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(3). We find that you are violating the Fort Wayne's facility's Title V permit.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action. The options we select may depend on, among other things, the length of time you take to achieve and demonstrate continuous compliance with the rules cited in the FOV.

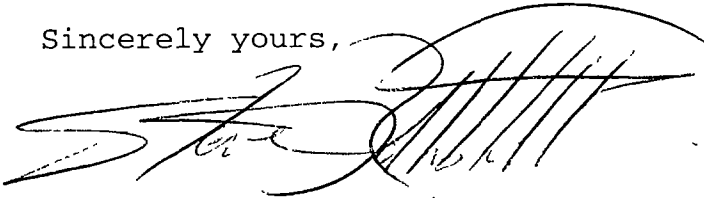
We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Kushal Som. You may call him

at (312) 353-5792 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Stephen Rothblatt', with a large, sweeping flourish extending from the end of the signature.

Stephen Rothblatt, Director  
Air and Radiation Division

cc: David McIver, Chief

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

<b>IN THE MATTER OF:</b>	)	
	)	
Rea Magnet Wire Company, Inc.	)	<b>FINDING OF VIOLATION</b>
Fort Wayne, Indiana	)	
	)	<b>EPA-5-05-13-IN</b>
	)	
Proceedings Pursuant to	)	
the Clean Air Act, 42 U.S.C.	)	
§ 7401 <u>et seq.</u>	)	
_____	)	

**FINDING OF VIOLATION**

The United States Environmental Protection Agency (U.S. EPA) finds that Rea Magnet Wire Company, Inc. (Rea Magnet), is violating the conditions of its Title V Permit as follows:

**Statutory and Regulatory Background**

1. Section 502(a) of the CAA, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the CAA, no source subject to Title V may operate except in compliance with a Title V permit.
2. Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a)(3), authorizes the Administrator to initiate an enforcement action whenever, among other things, the Administrator finds that any person has violated or is in violation of a requirement or prohibition of Title V of the CAA, or any rule promulgated, issued, or approved under Title V of the CAA.
3. The regulation at 40 C.F.R. § 70.6(b)(1) specifies that all terms and conditions in a permit issued under a Title V program are enforceable by U.S. EPA under the CAA.
4. U.S. EPA granted final interim approval of the Indiana Title V program on November 14, 1995 (60 Fed. Reg. 57191), and the program became effective on December 14, 1995. U.S. EPA granted final full approval to the Indiana Title V program on December 4, 2001 (66 Fed. Reg. 62969), which became effective on November 30, 2001.

**Facility Facts and Discussion**

5. Rea Magnet owns and operates a magnet wire facility at 3600 East Pontiac Street, Fort Wayne, Indiana (Rea Magnet Fort Wayne facility).
6. Indiana Department of Environmental Management issued Title V permit No. T003-6959-00014 to the Rea Magnet Fort Wayne facility on May 30, 2001, pursuant to the Indiana Title V program.
7. The Rea Magnet Fort Wayne facility includes twelve (12) oven unit numbers: 210-213, 220-223, 281-282, 283-284, 285-286, 290, 247, 248, 250, 254, 260 and 270.
8. The Rea Magnet Title V permit includes a description of ovens 210-213, 220-223, 281-282, 283-284, 285-286, 290, 247, 248, 250, 254, 260 and 270.
9. The Rea Magnet Title V permit at Section D.1, D.2, D.4, D.5 and D.6 states that ovens 210-213, 220-223, 281-282, 283-284, 285-286, 290, 247, 248, 250, 254, 260 and 270 consist of the following equipment:
  - A. Two (2) GE-I wire enameling ovens with integral internal catalytic oxidizers, unit numbers 210-213 and 220-223, each with a maximum rating of 191 pounds of wire per hour;
  - B. Three (3) SICME wire enameling oven with integral internal thermal oxidizers, unit numbers 281-282, 283-284 and 285-286, each with a maximum rating of 183 pounds of wire per hour;
  - C. One (1) Weather-Rite V-22 wire enameling oven with an integral internal thermal oxidizer, unit number 290, with a maximum rating of 810 pounds of wire per hour;
  - D. Four (4) Rea H-9 wire enameling ovens with external catalytic oxidizers, unit numbers 247, 248, 250 and 254, with a maximum rating of 6 pounds of wire per hour each;
  - E. One (1) MOCO wire enameling oven with an external thermal oxidizer, unit number 260, with a maximum rating of 429 pounds of wire per hour;
  - F. One (1) MOCO wire enameling oven with an external

thermal oxidizer, unit number 270, with a maximum rating of 571 pounds of wire per hour;

10. Rea Magnet's Title V permit at D.1.5 requires that the integral internal catalytic oxidizers, associated with the 210-213 and 220-223 ovens, shall have their catalysts replaced at a minimum of every twelve (12) months.
11. Rea Magnet's Title V permit at D.2.3(a) requires that the integral internal thermal oxidizers, associated with the 281-282, 283-284 and 285-286 ovens, operate with an overall efficiency of not less than 96 percent at all times when the wire enameling ovens are in operation.
12. The Rea Magnet Title V permit at D.2.3(c) requires that the integral internal thermal oxidizers, associated with the 281-282, 283-284 and 285-286 ovens, be operated at or above 1250 degrees Fahrenheit to maintain a 96 percent overall efficiency.
13. Rea Magnet's Title V permit at D.4.3(a) requires that the integral internal thermal oxidizer, associated with the 290 oven, operate with an overall efficiency of not less than 95.77 percent at all times when the wire enameling ovens are in operation.
14. The Rea Magnet Title V permit at D.4.3(c) requires that the integral internal thermal oxidizer, associated with the 290 oven, be operated at or above 1250 degrees Fahrenheit to maintain a 95.77 percent overall efficiency.
15. Rea Magnet's Title V permit at D.5.7 requires that the external catalytic oxidizers, associated with the 247, 248, 250 and 254 ovens, shall have their catalysts replaced at a minimum of every six (6) months.
16. Rea Magnet's Title V permit at D.6.3(a) requires that the external thermal oxidizers, associated with the 260 and 270 ovens, operate with an overall efficiency of not less than 85 percent at all times when the wire enameling ovens are in operation.
17. The Rea Magnet Title V permit at D.6.3(b) requires that the external thermal oxidizers, associated with the 260 and 270 ovens, be operated at or above 1250 degrees Fahrenheit to maintain a 85 percent overall efficiency.

**Finding of Violation**

18. On April 6, 2005, the Rea Magnet Fort Wayne facility submitted information that responded to a Section 114 Information Request regarding the 210-213 and 220-223 ovens. According to this letter, the following table shows violations related to the catalyst change requirement in D.1.5 of the Rea Magnet Title V permit:

Oven	Catalyst Change Dates	Description
210-213	12/21/01 to 12/27/02	6 Days Over Limit
220-223	6/27/00 to 12/21/01	176 Days Over Limit
220-223	12/21/01 to 12/27/02	6 Days Over Limit

19. On April 6, 2005, the Rea Magnet facility submitted information that responded to a Section 114 Information Request regarding the 281-282, 283-284 and 285-286 ovens. According to this letter, the following table indicates the number of minutes that each oven's thermal oxidizer remained below 1250 degrees Fahrenheit in violation of D.2.3(c) of the Rea Magnet Title V permit:

Oven	Date(s)	Description	Minutes
281-282	8/12/04	Below 1250°F	145
283-284	1/22/05	Below 1250°F	109
285-286	1/8/02	Below 1250°F	244
285-286	2/28/02	Below 1250°F	240
283-284	3/11/02	Below 1250°F	235
285-286	8/14/02	Below 1250°F	106
285-286	12/19/03	Below 1250°F	200

20. On April 6, 2005, the Rea Magnet facility submitted information that responded to a Section 114 Information Request regarding the 290 oven. According to this letter, the following table indicates the number of minutes that each oven's thermal oxidizer remained below 1250 degrees Fahrenheit in violation of D.4.3.(c) of the Rea Magnet Title V permit:

Oven	Date	Description	Minutes
290	2/2/02	Below 1250°F	305
290	2/14/03	Below 1250°F	85
290	1/26/05	Below 1250°F	15

21. On April 6, 2005, the Rea Magnet facility submitted information that responded to a Section 114 Information Request regarding the 247, 248, 250 and 254 ovens. According to this letter, the following table indicates violations related to the catalyst change requirement in D.5.7 of the Rea Magnet Title V permit:

Oven	Date(s)	Description
247	11/29/00 to 6/2/01	3 Days Over Limit
247	11/26/01 to 5/30/02	4 Days Over Limit
247	12/26/03 to 7/6/04	11 Days Over Limit
248	11/3/01 to 5/24/02	21 Days Over Limit
248	12/29/02 to 6/27/03	2 Days Over Limit
248	12/24/03 to 7/6/04	13 Days Over Limit
250	11/14/01 to 5/30/02	16 Days Over Limit
250	12/23/03 to 7/6/04	14 Days Over Limit
254	5/24/02 to 11/27/02	3 Days Over Limit
254	12/26/03 to 7/6/04	11 Days Over Limit

22. On April 6, 2005, the Rea Magnet facility submitted information that responded to a Section 114 Information Request regarding the 260 and 270 ovens. According to this letter, the following table indicates the number of minutes that each oven's thermal oxidizer remained below 1250 degrees Fahrenheit in violation of D.6.3(a) of the Rea Magnet Title V permit:

Oven	Date(s)	Description	Minutes
260	11/26/01	Below 1250°F	112
270	2/21/02	Below 1250°F	110
270	4/15/02 to 4/16/02	Below 1250°F	1,110

Rea Magnet's operation in violation of its Title V permit constitutes a violation of section 502 of the Clean Air Act and of 40 C.F.R. § 70.7(b).

6/23/2005  
Date

A handwritten signature in black ink, appearing to read 'Stephen Rothblatt', written over a horizontal line.

Stephen Rothblatt, Director  
Air and Radiation Division



**CERTIFICATE OF MAILING**

I, Betty Williams, certify that I sent a Finding of Violation, No. EPA-5-05-13-IN, by Certified Mail, Return Receipt Requested, to:

Marcus Leavitt, General Manager  
Rea Magnet Wire Company, Inc.  
3600 East Pontiac Street  
Fort Wayne, Indiana 46803

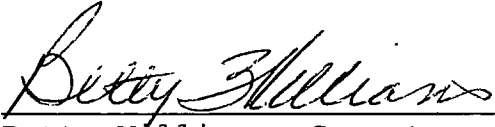
I also certify that I sent copies of the Finding of Violation by first class mail to:

Jennifer Dorn, Inspector  
Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue, Room 1001  
Indianapolis, Indiana 46206-6015

and

David McIver, Chief  
Office of Enforcement Air Section  
Indiana Department of Environmental Management  
100 North Senate Avenue, Room 1001  
Indianapolis, Indiana 46206-6015

on the 24<sup>th</sup> day of June, 2005.

  
Betty Williams, Secretary  
AECAS, (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320000602953062